



Personally Identifiable Information Policy

Policy Statement

It is the policy of the Town of Fenwick Island to protect personally identifiable information (PII) of employees and volunteers. The electronic restrictions and safeguards outlined in this policy provide guidance for employees and volunteers that have access to PII retained by the Town of Fenwick Island to ensure compliance with State and Federal regulations.

Definitions

Personally Identifiable Information (PII) is any information pertaining to an individual that can be used to distinguish or trace a person's identity. Some information that is considered PII is available in public sources such as telephone books, public websites, etc. This type of information is considered to be public PII and includes:

1. First and last name
2. Address
3. Work telephone number
4. Work email address
5. Home telephone number
6. General educational credentials
7. Photos and videos

In contrast, protected PII is defined as any one or more of types of information including, but not limited to:

1. Social Security Number
2. Username and password
3. Passport number
4. Credit card number
5. Clearances
6. Banking information
7. Biometrics
8. Date and place of birth
9. Mother's maiden name
10. Criminal, medical and financial records
11. Educational transcripts
12. Photos and videos including any of the above

Procedures

This section provides guidelines on how to maintain and discard PII. If current procedures fall outside this policy, or questions arise, please contact the Town Manager to suggest more efficient procedures for protecting PII. All electronic files that contained protected PII will reside within a protected information system location. All physical files that contain protected PII will reside within a locked file cabinet or room when not being actively viewed or modified. Protected PII is not to be downloaded to personal or Town of Fenwick Island owned employee or volunteer workstations or mobile devices (such as laptops, personal digital assistants, mobile phones, tablets, or removable media). PII will also not be sent through any form of insecure electronic communication (e.g., email or instant messaging systems). Significant security risks emerge when PII is transferred from a secure location to a less secure location or is disposed of improperly. When disposing of PII, the physical or electronic file should be shredded or securely deleted.

Incident Reporting

The Town Manager must be informed of a real or suspected disclosure of protected PII data within 24 hours after discovery (e.g., misplacing a paper report, loss of a laptop, mobile device, or removable media containing PII, accidental email of PII, possible virus, or malware infection or a computer containing PII).

Audits

Periodic audits of Town of Fenwick Island owned equipment and physical locations may be performed to ensure that protected PII is stored in approved information systems or locations. The purpose of the audit is to ensure compliance with this policy and to provide information necessary to continuously improve practices.

Enforcement

An employee or volunteer found to be in violation of this policy may be subject to disciplinary action as deemed appropriate based on the facts and circumstances giving rise to the violation.

Records Disposal

Records containing personal data are to be disposed of so as to prevent inadvertent compromise of data. Paper records are disposed of by shredding or other method approved of by the National Institute of Standards and Technology. The disposal method will render all personal data unrecognizable and beyond reconstruction.



FEMA



ACT RESPONSIBLY: PROTECT PERSONAL IDENTIFYING INFORMATION (PII)

Whether you are a FEMA employee, contractor, consultant, or in another position to manage or administer FEMA funds, you must protect PII. The Privacy Act of 1974 and the DHS Handbook for Safeguarding Sensitive PII (March 2012) requires us to implement PII safeguards, such as lockable containers to hold PII, secured trash bins, or approved shredders to dispose of any documents containing PII.

What PII Is:

Any information that can directly or indirectly identify an individual, including:

- Name
- Address
- Date of birth
- Driver's license
- Social Security number
- Financial information



Do Your Part:



- Learn to recognize PII.
- Respect the privacy of individuals.
- Do not leave PII materials open, visible, or unattended.
- Store or dispose of PII appropriately.

Protect PII at FEMA Disaster Relief Sites:

- Be aware of, and comply with, your responsibility to safeguard and dispose of PII in accordance with Federal standards, DHS Management Directives, and FEMA guidelines.
- Comply with all applicable privacy principles.
- Complete annual mandatory privacy awareness training.

For additional information or help with this topic, please contact the FEMA Privacy Branch via fema-privacy@fema.dhs.gov, or the OIG Hotline at <https://www.oig.dhs.gov/hotline>



The Town of Fenwick Island

800 Coastal Highway, Fenwick Island, DE 19944-4409
302-539-3011 ~ 302-539-1305 fax
www.fenwickisland.delaware.gov

Coronavirus (COVID-19) Policy

PURPOSE

The Town's priorities in setting this workplace policy is to:

- Maintain a safe and healthy workplace, including minimizing the potential for transmission of contagious disease.
- Maintain operational continuity.
- Encourage fairness, open communications and concern for the wellbeing of our employees, residents, and visitors.

CONSIDERATION

Whereas, domestic and foreign health authorities have issued guidance to citizens within their respective jurisdictions, both recommending and mandating precautionary measures to defend against the spread of COVID-19, the Town of Fenwick Island hereby implements the following policy:

POLICY

Employees who have symptoms of acute respiratory illness are strongly recommended to stay home and not come to work until they are free of fever (100.4° F [37.8° C] or greater using an oral thermometer), signs of a fever, cough, shortness of breath, and any other symptoms for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines (e.g. cough suppressants). Employees should notify their supervisor and stay home if they are sick.

- A. **Well Employees:** Employees who are well are expected at work as usual, even if they have been in contact with or caring for someone who is ill with an ordinary respiratory illness (in which case, typical preventive measures are recommended for them as care givers). Well employees are expected at work unless they have been:
 - a. caring for someone with a confirmed case of COVID-19, in which case they are required to self-isolate and follow any measure implemented by any regulatory authority.
 - b. in a CDC Level 3 area of concern for COVID-19; or
 - c. instructed to refrain from attending work by their personal physician or public health officials, in which case documentation must be provided.
- B. **Sick Employees:** Employees who have symptoms of respiratory illness must stay home and not come to work until they are free of fever, and any other symptoms for at least 24

hours, without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). A fever is defined as a temperature of 100.4 degrees Fahrenheit or 38 degrees Celsius taken by an oral thermometer.

Any employee who is diagnosed with, or is under observation or quarantine for COVID-19 must stay home and may not come to work until fully released for duty in writing by a competent medical provider or public health authority, submitted to and approved by the Town Manager prior to returning to work.

- C. **Non-Chargeable Sick Time:** Employees will not be required to use their accrued sick leave or vacation time should they be required to be quarantined as a result of exposure to or complications from a documented diagnosis of coronavirus/COVID-19.
- D. **Non-Chargeable Family and Dependent Care Time:** Employees with dependent children, partners, household members, or elders under their care who are ill or quarantined in the manner described at Section C above will not be required to use sick leave or vacation time should they be required to provide care. Appropriate documentation may be required.
- E. **Coverage Period:** Employees will be afforded their regular wages for up to 14 workdays to recover from any exposure. Should a time period greater than 14 days be required, the employee shall notify their supervisor and the Town Manager immediately. Each case greater than 14 days will be handled on a case by case basis.
- F. **Reporting Sick Time:** Employees who are out sick are asked to enter absences (using COVID POLICY) on their respective timesheet. Public health authorities may ask employers like the Town of Fenwick Island to monitor and report trends in employee absenteeism.
- G. **Return to Work:** In general, written medical clearance will not be required for return to work from ordinary illness of brief duration. This is being done to avoid overtaxing health care resources. However, the Town reserves the right to request confirmation of COVID-19, ongoing illnesses or that of family members. Documentation for any absences will be handled on a case by case basis.

EFFECTIVE DATE

This policy shall become effective upon an affirmative vote of adoption by a majority of the Town Council and shall remain in effect for 60 days unless extended by the Town Council.

ADOPTED